

Slip file  
Reclamation  
Demand

LAW OFFICES

**MILES & STOCKBRIDGE P.C.**

10 LIGHT STREET

BALTIMORE, MARYLAND 21202-1487

TELEPHONE 410-727-6464

FAX 410-385-3700

CAMBRIDGE, MD

COLUMBIA, MD

EASTON, MD

FREDERICK, MD

McLEAN, VA

ROCKVILLE, MD

TOWSON, MD

WASHINGTON, D.C.

Writer's Direct Dial:  
(410) 385-3762

Writer's E-Mail  
[jperrell@milesstockbridge.com](mailto:jperrell@milesstockbridge.com)

April 18, 2001

**BY FACSIMILE, OVERNIGHT MAIL,  
CERTIFIED MAIL AND FIRST-CLASS MAIL**

Laura Davis Jones, Esquire  
Pachulski, Stang, Ziehl,  
Young & Jones  
919 North Market Street  
Suite 1600  
Wilmington, Delaware 19899

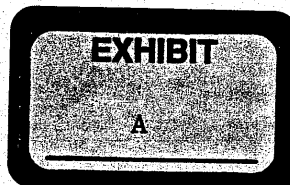
James H.M. Strayregen, Esquire  
Kirkland & Ellis  
200 East Randolph Drive  
Chicago, IL 60601

David B. Siegel, Esquire  
Senior Vice President and General Counsel  
W.R. Grace & Co.  
7500 Grace Drive  
Columbia, MD 21044-4098

***Re: In re W.R. Grace, Inc.  
Case No.: Jointly Administered Case No. 01-01139  
Notice of Reclamation by Niro, Inc.***

Dear Counsel:

I write as counsel to Niro, Inc. ("Niro"). Pursuant to Section 2-702 of the Uniform Commercial Code and 11 U.S.C. § 546 (c), and because of the insolvency and bankruptcy of W.R. Grace & Company, Inc. ("W.R. Grace"), Niro hereby demands the return of all goods that were received by W.R. Grace on or after March 29, 2001. Copies of the invoices which specifically describe the goods shipped by Niro and received by W.R. Grace are attached hereto as Exhibit A.



Laura Davis Jones, Esquire  
James H. M. Sprayregen, Esquire  
David B. Siegel, Esquire  
April 18, 2001  
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**MILES & STOCKBRIDGE P.C.**

**Unless the goods covered by this request are returned immediately, appropriate measures will be taken by Niro to reclaim the goods pursuant to applicable law. This letter is sent pursuant to applicable bankruptcy law and shall not be construed as a violation of 11 U.S.C. § 362(a).**

Please apprise me of your intentions with regard to this reclamation request. Thank you for your prompt attention to this matter.

Sincerely yours,



Joel L. Perrell Jr.

JLP/jlp

Attachments

cc: Mr. Robert E. Johnson, Jr.  
Mr. Frederick V. Shaw

Laura Davis Jones, Esquire  
James H. M. Sprayregen, Esquire  
David B. Siegel, Esquire  
April 18, 2001  
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**MILES & STOCKBRIDGE P.C.**

bcc: James C. Doub, Esquire  
Joseph J. Bellinger, Esquire

Exhibit A



NIRO Inc.  
9165 Runney Road  
Columbia, MD 21045-1991  
USA  
Tel 410-997-8700  
Fax 410-997-5021

**REMIT TO**

P.O. BOX 64162  
BALTIMORE, MD 21264-4162

INVOICE NO.

1013235

OUR ORDER NO.

CUSTOMER NO.

INVOICE DATE

PAGE

611

30965

04-15-01

1

SPECIAL MARKING

ORDER DATE

505130

05 APR 19 2001

BE-0988

CUSTOMER P.O. NO.

SHIPPED VIA

4500269275

DESCRIPTION

TECHNICAL SERVICE CALL BY RMB ON 4/6/01 TO INSPECT USED BOWEN #1 TOWER  
SPRAY DRYER, BE-988.

180.00

1.5 HRS IN-HOUSE SERVICE @ \$120/HR

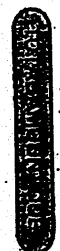
\$180.00

Form # 05-01 (9-97)

180.00

TAX

SPECIAL CHARGES



180.00

Acceptance and delivery of this merchandise is deemed to be in acceptance of the terms contained on the other side.  
Invoice Number must appear on all remittances. Payable in legal currency of the United States.  
Terms Net 30 Days unless otherwise specified.

ACCOUNTING COPY

# INVOICE

**REMIT TO:**  
**REMIT PAYMENT TO:**  
**P.O. BOX 64162**  
**BALTIMORE, MD 21264-4162**

**Shipped To:**

W.R. GRACE & COMPANY  
 DAVISON CHEMICAL DIVISION  
 5500 CHEMICAL ROAD  
 BALTIMORE MD 21226-1698  
 USA

Invoice No.: 49675  
 Invoice Date: 04-04-01  
 Order Number: 28948  
 Order Date: 04-04-01

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**Sold To:**

W.R. GRACE & COMPANY  
 CURTIS BAY WORKS  
 5500 CHEMICAL ROAD  
 BALTIMORE MD 21226-1698  
 USA

Customer PO: 4500263899  
 Customer Number: 005605  
 Customer Contact: LINDA

Date Shipped: 04-04-01  
 Shipped Via: UPS

\*\*\*\*\* PROFORMA COPY ONLY \*\*\*\*\*

QUAN. ORDERED	UM	PART NUMBER	DESCRIPTION	QUANTITY SHIPPED	QUANTITY B.O.	UNIT PRICE	EXTENSION
2	EA	0043-05	VALVE, CHECK, 10#, OIL INLET 9110780	2	0	96.87	193.74
2	EA	0043-03	VALVE, CHECK, 1/2#, OIL OUTLET 9110781	2	0	102.30	204.60
		***	FREIGHT			4.18	
							398.34

398.34

NET 398.34  
 TAX 0.00  
 SPECIAL CHARGES 4.18

TOTAL AMOUNT DUE 402.52

Acceptance and delivery of this merchandise is deemed to be in acceptance of the terms included herein.  
 Invoice Number must appear on all remittances. Payable in legal currency of the United States.  
 Terms Net 30 Days unless otherwise specified.

INVOICE

Apr 17 01 04:50p

Smb

410-7-5021

P.3

PAYMENT  
DATE

PAYMENT  
AMOUNT

BALANCE  
DUE  
402.52

Apr 17 01 04:50p

Smb

**INVOICE**

**REMIT TO:**  
**REMIT PAYMENT TO:**  
**P.O. BOX 64162**  
**BALTIMORE, MD 21264-4162**

Shipped To:

W.R. GRACE & COMPANY  
 DAVISON CHEMICAL DIVISION  
 5500 CHEMICAL ROAD  
 BALTIMORE MD 21226-1698  
 USA

Invoice No.: 49668  
 Invoice Date: 03-30-01  
 Order Number: 28942  
 Order Date: 03-29-01

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1

Sold To:

W.R. GRACE & COMPANY  
 CURTIS BAY WORKS  
 5500 CHEMICAL ROAD  
 BALTIMORE MD 21226-1698  
 USA

Customer PO: 4500254478  
 Customer Number: 005605  
 Customer Contact: LINDA  
 Date Shipped: 03-30-01  
 Shipped Via: WARD-PREPAID & ADD

***** PROFORMA COPY ONLY *****					QUANTITY SHIPPED	QUANTITY E.O.	UNIT PRICE	EXTENSION
QUAN. ORDERED	UM	PART NUMBER	DESCRIPTION					
1	EA	36-001	PARTS TO REPAIR		1	0	5,116.97	5,116.97
			BB-6, S/N 183A					
			LABOR TO REPAIR		1	0	2,340.00	2,340.00
1	EA	36-001L	BB-6, S/N 183A				84.44	
			*** FREIGHT					
								7,456.97

NET 7,456.97  
 TAX 0.00  
 SPECIAL CHARGES 84.44  
**TOTAL AMOUNT DUE 7,541.41**

Acceptance and delivery of this merchandise is deemed to be in acceptance of the terms included herein.  
 Invoice Number must appear on all remittances. Payable in legal currency of the United States.  
 Terms Net 30 Days unless otherwise specified.

**INVOICE**

PAYMENT DATE	PAYMENT AMOUNT	BALANCE DUE
		7541.41



P.O. BOX 31102  
BALTIMORE, MD 21264-4162

Customer PO: 4500255214  
Customer Number: 005605  
Customer Contact: LINDA  
  
Date Shipped: 03-29-01  
Shipped Via: UPS C.O.D. PARTS + FRT.

**7,200.00**

**TOTAL AMOUNT DUE** 7,210.48

# INVOICE

PAYMENT DATE	PAYMENT AMOUNT	BALANCE DUE
		7210.48